



Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie A. Stevenson, Director

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

By: Kelly A. Mink Date: _____

3/19/2021

TRANSMITTED ELECTRONICALLY

March 19, 2021

Mr. Des Gillen
President
BP-Husky Refining, LLC
Toledo Refinery
4001 Cedar Point Rd.
Oregon, Ohio 43616

**Re: Request for scheduled maintenance at BP-Husky Refining, LLC, Toledo Refinery
(premise number 0448020007)**

On March 8, 2021, the Toledo Division of Environmental Services ("TES"), the Ohio Environmental Protection Agency's ("Ohio EPA") contractual representative in Lucas County, received your company's written request, dated March 8, 2021, for authorization to continue to operate an emission unit at the BP-Husky Refining, LLC, Toledo Refinery ("BP-Husky") facility (facility ID number 0448020007) located at 4001 Cedar Point Road, in Oregon, Ohio, Lucas County, while performing maintenance of control equipment. Pursuant to the provisions of Ohio Administrative Code ("OAC") Rule 3745-15-06(A)(3), this request is for authorization to continue facility operations while West Flare Gas Recovery Compressors (emissions unit P004) is shut down for maintenance.

Ohio EPA has reviewed the request. Based on the information submitted within the request and on the recommendation of TES, I find this request acceptable. BP-Husky is authorized to continue facility operations while the CO Boiler is shut down until the scheduled maintenance is completed. All efforts shall be made to minimize the length of the maintenance, with consideration to safety and best engineering judgment, in order to prevent unnecessary emissions.

This authorization is subject to BP-Husky's adherence to the scheduled maintenance program outlined in its March 8, 2021 letter. If there is any deviation from the expressed program, such deviation shall be reported immediately to TES so that this authorization may be re-evaluated. This authorization may be revoked at any time by written notice from TES or this office should the situation no longer justify continued operation of the source.

You are hereby notified that this action of the Director is final and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30)

days after notice of the Director's action. The appeal must be accompanied by a filing fee of \$70.00 which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General's Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
30 East Broad Street, 4th floor
Columbus, OH 43215

This authorization does not exempt BP-Husky of any liability for any violation of Ohio law and does not limit the Director's authority to take action pursuant to the provisions of OAC Rule 3745-15-06(C).

Please notify TES prior to beginning the scheduled maintenance and again when the scheduled maintenance is complete and the CO Boiler is once again operating.

If you have any questions or information to report, please feel free to contact Peter Park of TES at (419) 936-3936.

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on how we did processing your request. We value your opinion.

Sincerely,



Laurie A. Stevenson
Director

LAS/mm

xc: Jim Kavalec, DAPC
John Paulian, DAPC
Muhammad Mereb, DAPC
Karen Granata, TES
Peter Park, TES
Ashley Zapp, BP-Husky Refining, LLC